

**IN THE UNITED STATES BANKRUPTCY COURT  
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CASE NO. 1:21-bk-02606 HWV**  
**WENDY LEE KEEFE** :  
**Debtor** : **CHAPTER 13**

**MOTION FOR EXTENSION OF TIME TO FILE  
SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF  
CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST,  
PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN**

**AND NOW comes Debtor, Wendy Lee Keefe, by and through her attorney, Gary J.**

**Imblum, and respectfully represents:**

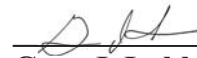
- 1. Debtor filed a Chapter 13 Bankruptcy to the above term and number on December 7, 2021.**
- 2. Debtor filed the bankruptcy as an emergency filing due to pending lawsuit.**
- 3. Debtor's counsel has been unable to gather sufficient information necessary to file the schedules and plan due to the emergency filing. Debtor provided the majority of the needed information on December 21, 2022 to counsel. However, Debtor is trying to locate a copy of her marital settlement agreement for my review and has requested but has not received a copy from her divorce counsel.**
- 4. Debtor's schedules are due to the Court on or before December 22, 2021.**

5. It is estimated that Debtor's counsel will need an additional 21 days in order to file the bankruptcy schedules and plan.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order extending the deadline for Debtor to file bankruptcy schedules and plan until January 12, 2022.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.



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Attorney for Debtor

Dated: December 22, 2021

**CERTIFICATE OF SERVICE**

I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS, AND CHAPTER 13 PLAN on the following person(s) by E-Service, addressed to:

JACK ZAHAROPOULOS ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.



Bernadette A. Davis, Paralegal

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Dated: December 22, 2021

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**Debtor** : **CHAPTER 13**

**ORDER**

**Upon consideration of Debtor's Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs and Chapter 13 Plan,**

**IT IS HEREBY ORDERED AND DECREED that the deadline for filing the  
aforementioned pleadings in the above captioned case is extended through January 12, 2022.**